

*Entered open Court 7/15/05, N. Ramirez, Deputy Clerk.*UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	CR. NO. 05-10048-RCL
v.)	
)	
LUIS ALBERTO ALDADINO, ET AL.)	
)	

STATUS REPORT

Pursuant to Local Rule 116.5(C), the parties are hereby jointly filing the following Status Report prepared in connection with the Status Conference scheduled for July 15, 2005.

1. Outstanding Discovery Issues

Defendant Carlos Ramirez filed discovery motions which are pending. The government and counsel for defendant Fermin Hernandez have been discussing a discovery issue regarding the tape recordings in this case which they hope to resolve shortly.

2. Additional Discovery

The government anticipates that, unless there is a stipulation regarding the drugs involved in this case, it will offer expert testimony regarding the drugs at issue. The defendants are not presently requesting expert discovery, but are reserving the right to seek such discovery pending disclosure of trial witnesses by the government. The government anticipates producing an additional drug laboratory certification.

3. Insanity/ Public Authority Defenses

None of the defendants intend to raise a defense of insanity or public authority.

4. Notice of Alibi

The government requested a Notice of Alibi in its Automatic Discovery Letter. No response has been received to that request.

5. Motions

The defendants will address motions with the Court at the July 15, 2005 status conference.

6. Scheduling

The defendants request that a final status conference be scheduled in approximately 30 days. The recordings in this case, which are voluminous, were not sent to the respective prisons of the defendants until the end of June. The defendants request the additional time to review the recordings with their respective clients. The parties agree that this time is excludable from Speedy Trial Act calculations pursuant to 18 U.S.C. § 3161(h)(8) and will provide a proposed order to the Court.

7. Speedy Trial Act

Per this Court's Order of Excludable Delay, dated May 20, 2005, as of August 15, 2005, no excludable days will have occurred leaving 70 days for commencement of trial.

8. Length of Trial

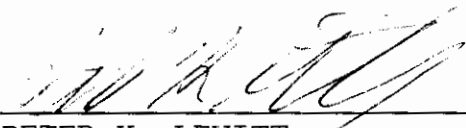
In the event that a trial is required, the parties estimate that it will last about two weeks.

Respectfully submitted,

MICHAEL J. SULLIVAN

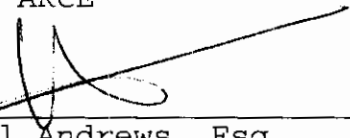
United States Attorney

By:

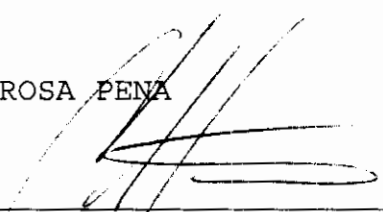

PETER K. LEVITT
Assistant U.S. Attorney
(617) 748-3355

FOR THE DEFENDANTS,

GLADYS ARCE


Michael Andrews, Esq.
21 Customs House
Boston, MA 02110
617-951-0072

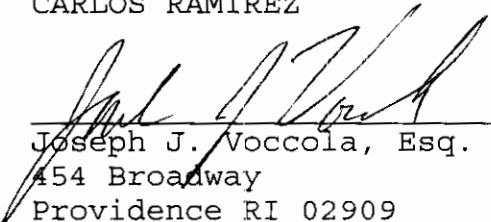
ROSA PENA


Carlos J. Dominguez, Esq.
232 Commercial Street
Boston, MA 02109
617-742-2824

LUIS DIAZ


Lenore Glaser, Esq.
25 Kingston Street
Boston, MA 02111
617 753-9988

CARLOS RAMIREZ



Joseph J. Voccola, Esq.
454 Broadway
Providence RI 02909
401 751 3900

MANUEL DISLA



Randy S. Chapman, Esq.
Chapman & Chapman
111 Everett Avenue
Suite 2A
Chelsea, MA 02150
617 884 6400

JUAN MERCED

William Keefe, Esq.
390 Centre St.
Jamaica Plain, MA 02130
617 983 9200

JOSE NAVARRO

Robert L. Sheketoff, Esq.
One McKinley Square
Boston, MA 02109
617 367 3449

ADNEER GONZALEZ

Raymond E. Gillespie, Esq.
875 Massachusetts Avenue, Suite
32
Cambridge, MA 02139

VICTOR FILPO

Eliot M. Weinstein, Esq.
228 Lewis Wharf
Boston, MA 02110
617 367 9334

LEOANNY HERNANDEZ

Victoria M. Bonilla
Victoria M. Bonilla, Esq.
77 Central Street, 2nd Fl.
Boston, MA 02109
617 350 6868

FERMIN HERNANDEZ

Keith S. Halpern
Keith S. Halpern
4 Longfellow Place, 37th Floor
Boston, MA 02114
617-722-9952

Dated: July 15, 2005